

BLANK ROME, LLP
Attorneys for Plaintiff
CHIMBUSCO PAN NATION PETRO-CHEMICAL CO., LTD.
Thomas H. Belknap, Jr. (TB-3188)
The Chrysler Building
405 Lexington Ave.
New York, NY 10174-0208
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHIMBUSCO PAN NATION PETRO-
CHEMICAL CO., LTD.,

Plaintiff,

-against-

FAIRWIND SHIPPING CO. LTD.,

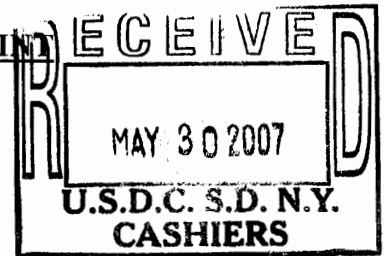
Defendant.

JUDGE CROTTY

07 CW 4537

07 Civ.

VERIFIED COMPLAINT



Plaintiff, CHIMBUSCO PAN NATION PETRO-CHEMICAL CO., LTD. ("Plaintiff"),
by its attorneys Blank Rome, LLP, complaining of the above-named Defendant, FAIRWIND
SHIPPING CO. LTD. ("Defendant"), alleges upon information and belief as follows:

1. This is a case of admiralty and maritime jurisdiction, as hereinafter more fully appears, and is an admiralty or maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure. The Court has admiralty jurisdiction under 28 U.S.C. §1333.
2. At all material times, Plaintiff was and now is a foreign company with its offices at Unit 3301-05, 33/F., Shui On Centre, 6-8 Harbour Road, Wanchai, Hong Kong.
3. At all material times, Defendant was and is a foreign corporation or other business entity organized with its offices at 15/F., Seaview Commercial Building, 21-24 Connaught Road West, Hong Kong, and with no place of business in the United States.

4. Plaintiff is a supplier of bunkers for ocean going cargo vessels.

5. Pursuant to mutually agreed contractual terms, Plaintiff supplied and defendant accepted bunkers in the amounts and on the dates and for the ocean-going cargo vessels specified on Exhibit A attached hereto.

6. In total, the purchase price for the bunkers supplied was US\$1,014,749.70.

7. In breach of the referenced contracts, Defendant has failed to pay any portion of the purchase price for said bunkers although payment is past due and has been duly demanded.

8. This action is to obtain security in respect of Plaintiff's claims against Defendant for breach of the referenced contracts, the merits of which Plaintiff hereby reserves the right to litigate in Hong Kong or elsewhere pursuant to the contracts.

9. The courts of Hong Kong routinely award interest and attorneys' fees and costs to the prevailing party. Plaintiff estimates it will be awarded interest of \$243,540, calculated at 8% for three years, plus attorneys' fees and costs of \$152,212.

10. The total amount of Plaintiff's claims for which Plaintiff requests issuance of Process of Maritime Attachment and Garnishment is **US\$1,410,501.70**.

11. Defendant cannot be found within this district within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, but Defendant is believed to have or will have during the pendency of this action, assets within this district consisting of cash, funds, freight and/or hire credits in the hands of garnishees in this District, including but not limited to electronic fund transfers.

WHEREFORE, Plaintiff prays:

A. That process in due form of law issue against the Defendant, citing it to appear and answer under oath all and singular the matters alleged in the Complaint;

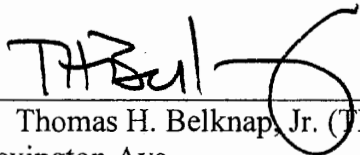
B. That since the Defendant cannot be found within this District pursuant to Rule B of the Supplemental Rules for Admiralty or Maritime Claims, this Court issue an Order directing the Clerk of Court to issue Process of Maritime Attachment and Garnishment pursuant to Rule B of the Supplemental Rules for Admiralty or Maritime Claims, attaching all of Defendant's tangible or intangible property or any other funds held by any garnishee in the district which are due and owing or otherwise the property of to the Defendant up to the amount of **US\$1,410,501.70** to secure the Plaintiff's claims, and that all persons claiming any interest in the same be cited to appear and pursuant to Supplemental Admiralty Rule B answer the matters alleged in the Complaint;

C. That this Court enter judgment for Plaintiff's damages plus interest and costs, or retain jurisdiction over this matter through the entry of a judgment on an arbitration award.

D. That Plaintiff may have such other, further and different relief as may be just and proper.

Dated: New York, NY
May 30, 2007

Respectfully submitted,
BLANK ROME, LLP
Attorneys for Plaintiff
CHIMBUSCO PAN NATION PETRO-
CHEMICAL CO., LTD.

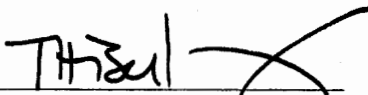
By 
Thomas H. Belknap, Jr. (TB-3188)
405 Lexington Ave.
New York, NY 10174-0208
(212) 885-5000

VERIFICATION

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

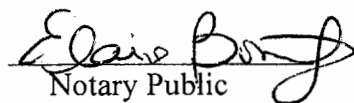
Thomas H. Belknap, Jr., being duly sworn, deposes and says:

1. I am a member of the bar of this Honorable Court and of the firm of Blank Rome LLP, attorneys for the Plaintiff.
2. I have read the foregoing Complaint and I believe the contents thereof are true.
3. The reason this Verification is made by deponent and not by Plaintiff is that Plaintiff is a foreign corporation, no officer or director of which is within this jurisdiction.
4. The sources of my information and belief are documents provided to me and statements made to me by representatives of the Plaintiff.



Thomas H. Belknap, Jr.

Sworn to before me this
30th day of May 2007


Notary Public

ELAINE BONOWITZ
Notary Public, State of New York
No. 43-4893320
Qualified in Richmond County
Certificate Filed in New York County
Commission Expires May 11, 20__ /



中燃遠邦石油化工有限公司

CHIMBUSCO PAN NATION
PETRO-CHEMICAL CO., LTD.



DEMAND NOTICE

TO	: FAIRWIND (HOLDINGS) LIMITED FAIRWIND SHIPPING CO., LTD. SHENZHEN FAIRWIND MARINE CO	DATE	: 29/5/2007
ATTN.	: 王杰民董事長兼總經理	SALE ORDER NO.	: _____
FAX NO.	: 0755-26885107 / 25172242	NO. OF PAGE	: 1
FROM	: 財務部 / 業務部		

茲通知貴司欠款情況如下，請立即匯出油款。

發票號碼	交油/離港日期	金額	船名
PCF20070341	2007-04-11	69,349.33	RESURGENCE
AC2007024	2007-04-11	2,800.00	RESURGENCE
PCF20070323	2007-04-12	47,500.00	HAO GUO
PCF20070342	2007-04-12	76,300.00	MARINA
PCF20070315	2007-04-14	47,577.32	ASIA STAR
PCF20070330	2007-04-14	97,750.00	FAIRWIND 308
PCF20070356	2007-04-17	34,530.00	HAO MIN
PCF20070327	2007-04-18	71,195.26	RESURGENCE
PCF20070346	2007-04-19	21,900.00	HAO FU
PCF20070354	2007-04-21	38,400.00	CAPE COOK
PCF20070353	2007-04-23	124,564.32	FAIRWIND 308
AC2007021	2007-04-28	1,950.00	HAO MIN
PCF20070369	2007-04-28	47,865.27	ASIA STAR
PCF20070379	2007-04-28	47,264.91	MARINA
PCF20070407	2007-04-28	20,940.00	RESURGENCE
PCF20070382	2007-05-02	100,026.88	CAPE COOK
PCF20070406	2007-05-04	39,736.41	FAIRWIND 308
PCF20070405	2007-05-09	38,550.00	HAO GUO
AC2007022	2007-05-13	3,850.00	HAO FU
PCF20070417	2007-05-15	80,350.00	RESURGENCE
AC2007023	2007-05-18	2,350.00	HAO MIN
總金額		\$1,014,749.70	

因我司經多次追討貴司的欠帳不果，請貴司即時匯出整筆 US\$1,014,749.70 欠款，否則我司將即時採取法律行動，一切法律費用將由貴司承擔。謝謝合作！



香港灣仔港灣道 6-8 號瑞安中心 33 樓 3301-05 室

Unit 3301-05, 33/F., Shui On Centre, 6-8 Harbour Rd. Wanchai, H.K. Tel: 28510832 Fax: 28505801

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Attorneys for Plaintiff
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Plaintiff,

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FAIRWIND SHIPPING CO. LTD.,

Defendant.

07 Civ.

**AFFIDAVIT UNDER
SUPPLEMENTAL RULE B**

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)


THOMAS H. BELKNAP, JR., being duly sworn, deposes and says:

1. I am a member of the Bar of this Honorable Court and a member of the firm of Blank Rome, LLP, attorneys for the Plaintiff herein. I am familiar with the circumstances of the complaint and submit this affidavit in support of Plaintiff's request for the issuance of process of maritime attachment and garnishment of the property of defendant, ("Defendant"), a foreign corporation, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

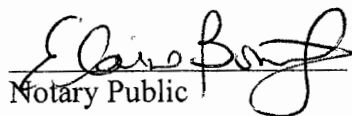
2. Defendant is a party to a maritime contract of charter party and is a foreign corporation with no office or place of business within this judicial district.

3. Under my supervision, my office did a search of the New York State Secretary of State, Division of Corporations, the Transportation Tickler, telephone assistance, and a general internet search.

4. In our search, we did not find any listing or reference to Defendant in this judicial district or the state of New York. In the circumstances, I believe Defendant cannot be found within this district.


THOMAS H. BELKNAP, JR.

Sworn to before me this
30th day May, 2007


Notary Public

ELAINE BONOWITZ
Notary Public, State of New York
No. 43-4893320
Qualified in Richmond County
Certificate Filed in New York County
Commission Expires May 11, 20__ / /